

Exhibit 3

Subject: Re: Rapaport v. Finkelman, 1:24-cv-05942-JGLC (S.D.N.Y.)
Date: Thursday, October 10, 2024 at 10:48:04 AM Eastern Daylight Time
From: Max Rodriguez
To: gideonrapaportlaw@outlook.com
Attachments: image001[91].png

Mr. Rapaport,

I represent Ms. Finkelman in your case against her in SDNY. I just attempted to call you at the number you have listed on filings and left a voicemail. I am now writing separately to try to confirm your receipt of my email below from September 27. Please acknowledge receipt regardless of whether you will substantively respond prior to filing of the motion.

Thanks,
Max Rodriguez

From: Max Rodriguez <max@maxrodriguez.law>
Date: Friday, September 27, 2024 at 8:37 AM
To: gideonrapaportlaw@outlook.com <gideonrapaportlaw@outlook.com>
Cc: Richard A. Altman <altmanlaw@earthlink.net>
Subject: Rapaport v. Finkelman, 1:24-cv-05942-JGLC (S.D.N.Y.)

Dear Mr. Rapaport,

I represent Abigail Finkelman in the above-captioned case, and now that you are representing yourself *pro se*, am contacting you directly in that capacity. If at any time you obtain new counsel that comes to represent you in this matter, please inform me or have them contact me so I may direct my communications appropriately.

Attached to this email is a letter and enclosed proposed motion for sanctions against you and your former counsel Mr. Altman (who is copied on this email). This letter and enclosed proposed motion constitute pre-filing service of the motion under Rule 11(c)(2), and the grounds for the motion are discussed therein. Per Rule 11(c)(2), if the challenged paper and claims (i.e., your complaint) are dismissed with prejudice within the 21-day safe harbor period, this motion will not be filed.

Ms. Finkelman reserves all rights and remedies with respect to you and Mr. Altman.

Sincerely,

MAX RODRIGUEZ
Principal and Founder
(he/him/his)



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